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Washington, DC 20006

**ATTORNEYS FOR THE AD HOC
GROUP OF FIRST LIEN LENDERS**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

**TEXAS RANGERS BASEBALL
PARTNERS,
DEBTOR.**

§
§
§ **CASE NO. 10-43400-DML-11
(Chapter 11)**
§
§

IN RE:

**RANGERS EQUITY
HOLDINGS, L.P.,
ALLEGED DEBTOR.**

§
§
§ **CASE NO. 10-43624-11
(Chapter 11)
(Involuntary Petition Pending)**
§

IN RE:

**RANGERS EQUITY
HOLDINGS GP, LLC,
ALLEGED DEBTOR.**

§
§
§ **CASE NO. 10-43625-11
(Chapter 11)
(Involuntary Petition Pending)**
§

**VERIFIED STATEMENT OF MILBANK, TWEED, HADLEY &
MCCLOY LLP PURSUANT TO BANKRUPTCY RULE 2019**

Milbank, Tweed, Hadley & McCloy LLP (“Milbank”) hereby makes the following statement (“Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy

Procedure in connection with Milbank's representation of multiple creditors of Texas Rangers Baseball Partners ("TRBP"); Rangers Equity Holdings, L.P., and Rangers Equity Holdings GP, LLC (collectively, the "Debtors") in the above-captioned chapter 11 cases:

1. As of the date hereof, Milbank represents certain entities in their capacities as lenders and/or managers of entities serving as lenders (collectively, the "First Lien Lenders") under that certain Amended and Restated First Lien Credit and Guaranty Agreement dated as of December 19, 2006 (the "First Lien Facility"), among Hicks Sports Group LLC ("Hicks"), certain subsidiaries of Hicks as Guarantors, the Lenders party thereto, and others.

2. The names and addresses of the First Lien Lenders represented by Milbank are as follows:

GSP Finance LLC
6 E. 43rd Street, 19th Floor
New York, NY 10017

Kingsland Capital Management
1325 Avenue of the Americas - 27th Floor
New York, NY 10019

Monarch Alternative Capital LLC
535 Madison Avenue
New York, NY 10022

Sankaty Advisors, LLC
111 Huntington Avenue
Boston, MA 02199

Stonehill Capital Management LLC
885 Thrid Avenue, 30th Floor
New York, NY 10022

3. As of May 24, 2010, the date on which TRBP commenced the above-captioned chapter 11 case (the "Commencement Date"), the aggregate principal amount owing

under the First Lien Facility to the First Lien Lenders represented by Milbank was not less than \$208.2 million.¹

4. Milbank was retained as counsel to the First Lien Lenders listed above prior to the Commencement Date.

5. Upon information and belief formed after due inquiry, Milbank does not hold any claims against, or interests in, the Debtors.

6. Milbank reserves the right to amend this Statement as necessary and will promptly supplement this Statement to the extent any material changes occur in the facts set forth herein or if it is retained by additional parties to represent them in the Debtors' chapter 11 case.

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¹ Milbank also represents four funds advised by Sankaty Advisors LLC, holding not less than \$7.1 million in claims under that certain Second Lien Credit and Guaranty Agreement dated as of December 19, 2006, by and among Hicks, certain subsidiaries of Hicks as Guarantors, and the Lenders party thereto, solely in connection with the filing of involuntary petitions against Rangers Equity Holdings, L.P., and Rangers Equity Holdings GP, LLC.

I verify under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Dated: June 1, 2010
New York, New York

MILBANK, TWEED, HADLEY & McCLOY LLP

/s/ Dennis F. Dunne

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Counsel for the Ad Hoc Group of First Lien Lenders

CERTIFICATE OF SERVICE

I certify that on June 1, 2010, that the above-captioned pleading was served via the Bankruptcy Court's electronic filing system on each of those parties receiving notices therefrom and via first class United States mail, postage prepaid on those parties on the Debtor's master service list that do not receive electronic notice.

/s/ Andrew M. Leblanc

One of Counsel